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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION REGARDING SCHEDULE
FOR DISCOVERY AND MOTION FOR
SUMMARY JUDGMENT ON OBJECTION
TO CLAIM OF AMIR SHAHMIRZA AND
KOMIR, INC.**

[Related to Dkt. Nos. 12130]

PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), on the one hand, and Creditors Amir Shahmirza (Agent for Komir, Inc.) and Komir, Inc. (together, “**Shahmirza**,” and, collectively with the Reorganized Debtors, the “**Parties**” and each, a “**Party**”) on the other hand, by and through their respective counsel, hereby stipulate and agree as follows:

RECITALS

A. On March 20, 2019, Amir Shahmirza filed proof of claim number 2090 in the Chapter 11 Cases.

B. On April 8, 2022, the Reorganized Debtors filed the *Reorganized Debtors’ Objection to Proof of Claim No. 2090 Filed by Amir Shahmirza* (the “**Objection**”) [Docket No. 12130].

C. On January 31, 2023, Amir Shahmirza (as agent of, and acting on behalf of, Komir, Inc.) filed proof of claim number 109855 in the Chapter 11 Cases, amending proof of claim number 2090.

D. On June 12, 2023, the Court issued its *Memorandum Decision on Motion for Partial Summary Judgment and Counter-Motion for Summary Judgment* [Dkt. No. 13832] and corresponding *Order Granting Motion for Partial Summary Judgment* [Dkt. No. 13833] and *Order Denying Counter-Motion for Summary Judgment* [Dkt. No. 13834].

E. On July 11, 2023, the Court held a status conference on the Objection.

F. The Parties have conferred further regarding discovery and further dispositive motions and agree to the schedule below.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:

1. Shahmirza shall file a second motion for summary judgment (the “**Shamirza MSJ**”) by September 5, 2023.

2. The Parties shall complete written discovery by October 6, 2023.

3. The Parties shall complete depositions of all percipient witnesses by October 15, 2023

4. The Reorganized Debtors shall file a response to the Shahmirza MSJ by October 20, 2023.

- 1 5. Shahmirza shall file a reply in support of the Shahmirza MSJ by November 17, 2023.
- 2 6. The Parties shall exchange written reports of all expert witnesses by November 18, 2023.
- 3 7. The Court shall hold a hearing on the Shahmirza MSJ in the first week of December, or
- 4 such other date as is convenient for the Court.
- 5 8. After disposition of the Shahmirza MSJ, the Court will hold a further status conference
- 6 to consider the issues remaining for trial and any other pre-trial matters, including the final setting of
- 7 trial dates and other pre-trial conferences.
- 8 9. The Parties shall complete all depositions of expert witnesses by December 31, 2023.
- 9 10. The Parties shall prepare for a trial on all remaining issues to be conducted during late
- 10 January or early February 2024.
- 11 11. The schedule set forth herein is subject to adjustment by agreement between the parties
- 12 with Court approval, or by order of the Court upon good cause shown.
- 13 12. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies
- 14 arising from this Stipulation or any Order approving the terms of this Stipulation.
- 15 13. In the event that the terms of this Stipulation are not approved by the Bankruptcy Court,
- 16 it shall be null and void and have no force or effect.

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19 Dated: July 25, 2023

20 KELLER BENVENUTTI KIM LLP

21 ROVENS & LAMB LLP

22 LAW OFFICES OF JENNIFER L. DODGE, INC.

COHEN AND JACOBSON, LLP

23 /s/ Thomas B. Rupp

24 Thomas B. Rupp

25 *Attorneys for Debtors and*

26 *Reorganized Debtors*

23 /s/ Lawrence A. Jacobson

24 Lawrence A. Jacobson

25 *Attorneys for Amir Shahmirza (Agent*

26 *for Komir, Inc.) and Komir, Inc.*